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12
13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN JOSE DIVISION

16 *In re Google Generative AI Copyright*
17 *Litigation*

Master File Case No.: 5:23-cv-03440-EKL
Consolidated with Case No.: 5:24-cv-02531-EKL

18 **STIPULATION AND [PROPOSED] ORDER**
19 **TO EXTEND DEADLINE TO RE-SUBMIT**
20 **HYPERLINK AGREEMENT OR DISPUTE**
21 **TO THE COURT**
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1 Plaintiffs Steve Almond, Sarah Andersen, Burl Barer, Jessica Fink, Kirsten Hubbard, Hope
2 Larson, Mike Lemos, Jill Leovy, Connie McLennan, and Jingna Zhang (“Plaintiffs”) and
3 Defendants Google LLC and Alphabet Inc. (“Defendants”) (collectively, “the Parties”), by and
4 through their respective counsel of record, hereby stipulate as follows:

5 WHEREAS, on April 3, 2025, the Court ruled on the Parties’ joint discovery letter
6 concerning disputed provisions of a protective order and ESI protocol (the “Order”) (*see* Dkt. Nos.
7 117, 117-1);

8 WHEREAS, in making its ruling, the Court concluded it had insufficient information
9 regarding Plaintiffs’ proposal concerning hyperlinked document metadata (*see* Dkt. 117-1);

10 WHEREAS, the Court directed the Parties to meet and confer regarding Plaintiffs’
11 proposal and, in the event the Parties cannot reach agreement, to re-submit the issue for the
12 Court’s consideration by no later than April 9, 2025 (*see id.*);

13 WHEREAS, the Parties have met and conferred pursuant to the Court’s Order and, subject
14 to the Court’s approval, have agreed that the deadline to re-submit the hyperlink dispute should be
15 extended to April 11, 2025;

16 WHEREAS, a modest extension of time will allow Defendants to complete their
17 investigation regarding the feasibility of Plaintiffs’ hyperlink proposal, and will promote informed
18 meet and confers that may narrow or eliminate the Parties’ hyperlink dispute;

19 WHEREAS, this stipulated request is being made in the interests of judicial economy and
20 in good faith, is not for the purpose of delay, and will not prejudice any of the Parties; and

21 WHEREAS, the requested time modification will not affect any other deadlines for this
22 case;

23 NOW, THEREFORE, based on the above stipulation, pursuant to Civil Local Rules 6-2
24 and 7-12, and with Defendants and Plaintiffs reserving all rights and defenses, IT IS HEREBY
25 STIPULATED by and between the Parties, subject to the approval of the Court, that:

26 The deadline to re-submit the Parties’ hyperlink dispute for the Court’s consideration is
27 extended from April 9, 2025 to April 11, 2025.
28

Respectfully submitted,

Dated: April 9, 2025

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Dated: April 9, 2025

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SIGNATURE ATTESTATION

I, David H. Kramer, am the ECF User whose ID and password are being used to file this document. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that the concurrence in the filing of this document has been obtained from the other signatory.

By: /s/ David H. Kramer

David H. Kramer

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Honorable Susan van Keulen
United States Magistrate Judge